UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

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Plaintiff, Case: 2:22-cr-20204 Hon Denise Page Hood

Referral Judge: Grey, Jonathan J.C.

Violation: 18 U.S.C. § 641

Filed: 4/12/2022

INFO USA V GORDON (LH)

Katie Gordon, A/K/A Katie Fitzsimonds,

v.

Defendant.

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE18 U.S.C. § 641 - Theft of Government Funds

Katie Gordon, a/k/a Katie Fitzsimonds

Beginning in or around March 2009, and continuing through March 2019, in the Eastern District of Michigan, the defendant Katie Gordon, a/k/a Katie Fitzsimonds, did knowingly and willfully steal, purloin, and convert to her use money of the Social Security Administration (SSA), a department or agency of the United States, to wit: Social Security Act, Title XVI, Supplemental Security Income (SSI) benefits to which she was not legally entitled, having a value greater than \$1,000.00.

The benefits described above were monies paid out by the Social Security Administration to the defendant in her capacity as Representative-Payee for her disabled child (the "beneficiary"). Under the provisions of the Social Security Act, the defendant was required provide truthful information about the beneficiary's household composition and resources. However, on multiple occasions the defendant intentionally concealed the fact that her husband, the beneficiary's stepfather, was a member of the household and contributed to the family's finances. The defendant concealed this information because she knew that it would likely impact the beneficiary's eligibility to continue receiving SSI benefits.

All in violation of Title 18, United States Code, Section 641.

DAWN N. ISON United States Attorney

s/John K. Neal

JOHN K. NEAL

Chief, White Collar Crime Unit

RYAN A. PARTICKA

Assistant U.S. Attorney

Dated: April 12, 2022

| United States District Court Eastern District of Michigan | Criminal Case Cover Sheet | | Case Number 2:22-cr-20204 | |
|---|--|---|---|--|
| NOTE: It is the responsibility of the Assistant U.S. A | Attorney signing this form to co | mplete it accurately | in all respects. | |
| Companion Case Information | n | Companion Case Number: | | |
| This may be a companion case based upon LCrR 57.10 (b)(4)1: | | Judge Assigned: | | |
| □Yes ⊠No | | AUSA's Initials: R.A.P. | | |
| Case Title: USA v. Katie Go | rdon | | | |
| County where offense occu | rred: Jackson | | | |
| Check One: ⊠Felony | □Mis | demeanor | ☐ Petty | |
| | rmation based upon rmation based upon | prior complaint | [Case number:] omplete Superseding section below]. | |
| Superseumy Case imormation | | | | |
| Superseding to Case No: | | Judge: | | |
| Corrects errors; no addition Involves, for plea purpose Embraces same subject r | es, different charges or a | idds counts. | its or charges below: | |
| Defendant name | Cha | rges | Prior Complaint (if applicable) | |
| | | | | |
| | listed Assistant Unit | ed States Att | orney is the attorney of record for | |
| the above captioned case. | | | | |
| April 12, 2022 | s/Ryan A. Particka | | | |
| Date | Assistant U 211 W. Fo Detroit, MI | Ryan A. Particka Assistant United States Attorney 211 W. Fort Street, Suite 2001 Detroit, MI 48226-3277 Phone: 313-226-9635 | | |

Attorney Bar #:

Fax: 313-226-0816 E-Mail address: Ryan.Particka@usdoj.gov

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.